

**Before the
Federal Communications Commission
Washington, DC**

In the Matter of)	
The Wireline Competition Bureau Seeks)	CC Docket 96-45
Comment on Petitions Concerning)	
Eligible Telecommunications Designations)	WC Docket No. 03-109
and the Lifeline and Link-Up Universal)	
Service Support Mechanism)	

COMMENTS OF THE AMERICAN FOUNDATION FOR THE BLIND

The American Foundation for the Blind (AFB) is a leading national resource for people who are blind or visually impaired, the organizations that serve them, and the general public. The mission of AFB is to enable people who are blind or visually impaired to achieve equality of access and opportunity that will ensure freedom of choice in their lives.

AFB submits these comments in support of the petitions of Tracfone Wireless, Inc. and AT&T which would increase the access of low income individuals who are blind or visually impaired to wireless telecommunications services through the inclusion of wireless carriers and resellers as eligible telecommunications carriers (ETC) in the Lifeline and Link-Up low income universal service support mechanisms.

Beginning with the process resulting in the Commission's final Report and Order on "Access to Telecommunications Services, Equipment, and Customer Premises Equipment" through to the Commission's most recent IP-Enabled Notice of Proposed Rulemaking, AFB has sought to call the attention of the Commission to the necessity of regulating to ensure the full participation of individuals who are blind or visually impaired in the telecommunications revolution.

For individuals who are blind or visually impaired whose income is not sufficient to afford conventional wireless service plans, access to wireless services is not simply a convenience or a means of increasing the quality of life. It is a vital foundation for public safety and full participation in society.

Deployment of wireless services has had a significant impact on traditional low income access devices such as the lowly payphone, now fewer and fewer in number. Loss of this convenient and reliable service has significant impact. For example, while never affording completely reliable access, at least low income individuals who are blind or visually impaired could use pay wire line phones to access taxis and subsidized paratransit services, or to obtain the latest schedules and service status information for public transport. Public safety and weather related emergencies pose yet another problem. In these circumstances it can be extremely dangerous to try to find a working wire line

phone. These situations are made even more dangerous for individuals who must use the phone to re-supply prescriptions or access other needed medical services.

This increasing lack of access to wire line phones also poses significant challenges to individuals who are blind or visually impaired who are employed but are members of the large population of “the working poor.” Increasingly, mobility on the job site means no access to a wire line phone to enable workers to keep in touch with their children, schools and emergency services or to enable them to carry out their responsibility for the care of elderly family members.

In connection with this proceeding, we must call the attention of the Commission to the vigorous advocacy activities of organizations of and for individuals with sensory impairments with respect to the accessibility of telecommunications equipment and services. This activity has not been matched with a similar level of attention by the telecommunications equipment and service sectors.

We remain hopeful that progress will come. In the meantime, we believe that these petitions have the meritorious effect of increasing carrier choices for those willing to meet the service requirements of the Lifeline program.

Respectfully submitted

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